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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION**

IN RE: YAHOO! INC. CUSTOMER DATA)
SECURITY BREACH LITIGATION)

No. 16-md-02752-LHK

**PLAINTIFFS' REVISED¹ RESPONSE TO
ORDER FOR SUPPLEMENTAL
INFORMATION**

¹ Exhibit 1 has been revised to address a clerical error in the hourly billing rates for counsel, Ariana Tadler and Matthew Kupillas.

1 Plaintiffs moved to provide notice to the Class of the Settlement in this matter² on April 8,
2 2019. (ECF No. 368). On June 24, 2019, the Court entered an order seeking supplemental
3 information, specifically:

4 (1) additional lodestar information, including the name of the
5 attorneys, paralegals, or other individuals who worked on the case,
6 their title, their date of admittance (if applicable), and their hourly
7 rate (as done in ECF No. 337-6); and (2) an explanation of the total
8 incentive award request, including how many Plaintiffs will request
9 \$2,500, how many Plaintiffs will request \$5,000, and how many
10 Plaintiffs will request \$7,000.

11 (ECF No. 377).

12 In accord with that Order, attached hereto as Exhibit 1, is the requested additional lodestar
13 information for all those involved in the MDL Case;³ and attached as Exhibit 2 is the requested
14 additional lodestar information for all those involved in the JCCP Case.

15 As to the Service Award requests, Class Counsel will seek a Service Award of \$7,500 for
16 eight Plaintiffs, all from the MDL Case, as they each had their computers forensically imaged and
17 were deposed: Andrew Mortensen, Mali Granot, Paul Dugas, Yaniv Rivlin, Matthew Ridolfo,
18 Deana Ridolfo, Kimberly Heines, and Hashmatullah Essar. Counsel will seek Service Awards of
19 \$5,000 for three Plaintiffs, as they were either deposed or had their computers forensically imaged:
20 Brian Neff (MDL Case), John Bell (JCCP Case), and Michelle Bouras (JCCP Case). And Counsel
21 will seek Service Awards of \$2,500 for five Plaintiffs, all from the JCCP Case, as they were not
22 deposed and did not have their computers forensically imaged: Jana Brabcova, Reid Bracken,
23 Hilary Gamache, Jared Pastor, and Brendan Quinn. Combined, the request for Service Awards
24 will therefore total \$87,500.00.

25 ² A process previously referred to as preliminary approval, *see* Fed. R. Civ. P. 23, 2018 Advisory
26 Committee Note., Subdivision (c)(2).

27 ³ Unless otherwise noted, all capitalized terms are defined in the Amended Settlement Agreement
28 and Release and/or the Memorandum in Support of Plaintiff's Motion to Notice the Class (ECF
Nos. 369, 369-2).

1
2
3 DATED: June 26, 2019

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4
5 s/ John A. Yanchunis

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CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2019, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 25, 2019.

s/ John A. Yanchunis

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